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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
ALL YEAR HOLDINGS LIMITED,	:	Case No. 21-12051 (MG)
	:	
Debtor.	:	
	:	
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Joint Report Concerning Plan Administrator’s Rule 2004 Subpoena to Yoel Goldman

Assaf Ravid, as Plan Administrator,¹ through counsel, and with the consent of counsel to Mr. Yoel Goldman, hereby submits this joint report regarding the Bankruptcy Rule 2004 subpoena served on Mr. Yoel Goldman (“*Mr. Goldman*”) as authorized by this Court on September 15, 2023 (ECF No. 443) and pursuant to the Court’s instructions at the informal discovery conference held on January 9, 2024.

Following the informal discovery conference, the parties engaged in further meet-and-confer sessions with an aim to prioritize particular accounts and the movement of the Debtor’s

¹ Capitalized terms used but not defined herein have the meanings given to them in the *Omnibus Ex Parte Application of Plan Administrator for Order (I) Authorizing Issuance of Subpoenas and (II) Granting Related Relief* filed contemporaneously herewith.

assets within those accounts. Mr. Goldman produced documents relating to those accounts on January 26, 2024, and, through counsel, has advised that he anticipates at least one more document production in that regard. Additionally, the parties are now engaged in further meet-and-confer efforts related to new, prioritized searches for documents with an aim to conduct a deposition of Mr. Goldman. The Plan Administrator's investigation into the flow of millions of funds to and from these and related accounts continues, and he expects a deposition to shed light on whatever information remains to be discovered following the completion of document production.

Although Mr. Goldman's obligations under the subpoena remain outstanding and further document production is anticipated, the Plan Administrator's assessment after having reviewed the document production from January 26, 2024, is that Mr. Goldman's compliance with the subpoena is now on a more productive path, and the parties would be best served by continuing their meet-and-confer efforts. Accordingly, the Plan Administrator does not see a need, at this time, for further Court intervention, although he reserves all of his rights to request the same should his assessment change. Mr. Goldman reserves all of his rights as well.

Dated: January 30, 2024
New York, New York

/s/ Michael Friedman
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